

8-10-05

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. National Frozen Foods Corporation supports the continued allowance of the following substance(s):

Name of Substance	Location on National List 205.605(a), 205.605(b), 205.606)	Reason for continued allowance.	Supporting Documents
Hydrogen Peroxide	205.605(b)	For use in sanitizing process water.	NOP existing authorization of use in the National List.
Chlorine Dioxide	205.605(b)	For use in sanitizing process water.	NOP existing authorization of use in the National List.
Sodium Hypochlorite	205.605(b)	For use in sanitizing process equipment.	NOP existing authorization of use in the National List.
Potassium Hydroxide	205.605(b)	For use in treating boiler water.	NOP existing authorization of use in the National List.
Sodium Hydroxide	205.605(b)	For use in treating boiler water.	NOP existing authorization of use in the National List.
Peracetic Acid	205.601(a)	For use in sanitizing process equipment.	NOP existing authorization of use in the National List.

In addition to the above items, it is requested that the items below be added to the National List:

Name of Substance	Location to add in National List	Reason for requested allowance.	Supporting Documents
Peracetic Acid	Add to section 205.605(b)	For use in sanitizing process water and equipment.	OMRI review of Peracetic acid for use in food processing and handling: http://www.omri.org/peracetic_acid3.pdf This substance is already approved under section 205.601(a)
Acetic Acid	Add to section 205.605(b)	For use in sanitizing process water and equipment.	Oregon Tilth Certified Organic Generic Materials List: Acetic acid is listed by OTCO as allowed for cleaning and sanitizing of equipment for organic processing.

Sincerely,

Marcus Ewton
Asst. QA Manager
National Frozen Foods Corporation
Albany, OR